

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**James Bussey, *on behalf of himself*  
*and others similarly situated*,  
Plaintiff,**

**CASE NO.: 1:25-cv-04078-MLB**

**v.**

**Enhance Health LLC,  
  
Defendant.**

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**CONSENT MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT**

Under Federal Rule of Civil Procedure 6, Defendant Enhance Health LLC respectfully moves this Court to extend the time to answer or otherwise respond to Plaintiff's Complaint to September 15, 2025. Defendant states the following as good cause for this motion:

1. Plaintiff filed the Complaint on July 23, 2025. (ECF No. 1).
2. Defendant was served the Complaint on July 25, 2025, making Defendant's response due August 15, 2025. (ECF No. 6).
3. Defendant and its counsel require additional time to complete its preliminary investigation and assess, *inter alia*, the validity and sufficiency of Plaintiff's allegations, the defenses available to any liability alleged by Plaintiff, and whether early motion practice is warranted. Additional time will also allow the

parties to determine whether they can resolve the Complaint without judicial intervention.

4. This is Defendant's first request for an extension. The Court has not yet entered a scheduling order in the case and the requested extension will not impact these proceedings.

5. Defendant conferred with Plaintiff's counsel, who advised that Plaintiff does not oppose the extension. Accordingly, the extension will not prejudice Plaintiff.

6. This request is made in good faith and not for purposes of delay.

7. In light of the foregoing, good cause exists to extend the time for Embodied to respond to the Complaint. *See, e.g., Lizarazo v. Miami-Dade Corr. & Rehab. Dep't*, 878 F.3d 1008, 1012 (11th Cir. 2017) (explaining that extensions "should be liberally granted absent a showing of bad faith . . . or undue prejudice.") (quotation omitted).

WHEREFORE, Defendant respectfully requests that the Court grant this motion and allow it until **September 15, 2025**, to answer, move, or otherwise respond to the Complaint.

*[Signature Appears on Following Page]*

Respectfully submitted this 12th day of August, 2025.

**WATSTEIN TEREPKA LLP**

/s/ Ryan D. Watstein

Ryan D. Watstein

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*Counsel for Defendant Enhance Health LLC*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 12th day of August 2025, I caused to be electronically filed a true and correct copy of the foregoing with the Clerk of Court by using the CM/ECF system, which will send a notice of filing to all counsel of record.

/s/ Ryan D. Watstein

Ryan D. Watstein